

**R.A.B. Food Group, LLC****ONE HARMON PLAZA, 10TH FLOOR, SECAUCUS, NJ 07094****FAX COVER SHEET**

To: Arthur Neal
USDA, Natl Organic Program
Company: Director
Phone:
Fax: 202-205-7808
From: Mark Walker
CC: Gerry Hill-RAB Food Group
3203 Primrose Trail
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Date: August 15, 2005

Pages (including cover sheet) 4**Confidentiality Notice:**

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Comments:

Dear Mr. Neal,

Please find the accompanying documents on which we've noted many items that we currently use in our "Guiltless Gourmet" brand products and which are approved on the current substances allowed list for products labeled as "organic" or "made with organic". The items that are important to our ability to continue to produce under these terms are marked with an asterisk to the left of the name of the item. All of these items are obviously on the current approved list.

Thank you,

Mark Walker, Director of Operations
Guiltless Gourmet, a brand of The R.A.B. Food Group, LLC

Please confirm receipt of my request.

Subpart G - Administrative**NOP: Final Rule**

§ 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))."

The following nonagricultural substances may be used as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))" only in accordance with any restrictions specified in this section.

(a) *Nonsynthetics allowed:*

~~*~~ (1) Acids

(i) Alginic

(ii) Citric - produced by microbial fermentation of carbohydrate substances

(iii) Lactic

~~(2) Bentonite~~

(3) Calcium carbonate

(4) Calcium chloride

~~*~~ (5) Colors, nonsynthetic sources only

~~*~~ (6) Dairy cultures

(7) Diatomaceous earth - food filtering aid only

~~*~~ (8) Enzymes - must be derived from edible, nontoxic plants, nonpathogenic fungi, or nonpathogenic bacteria

~~*~~ (9) Flavors, nonsynthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative.

(10) Kaolin

(11) Magnesium sulfate, nonsynthetic sources only

(12) Nitrogen - oil-free grades

(13) Oxygen - oil-free grades

(14) Perlite - for use only as a filter aid in food processing

~~*~~ (15) Potassium chloride

(16) Potassium iodide

~~*~~ (17) Sodium bicarbonate

(18) Sodium carbonate

(19) Waxes - nonsynthetic

(i) Carnauba wax

(ii) Wood resin

(20) Yeast - nonsynthetic, growth on petrochemical substrate and sulfite waste liquor is prohibited

~~*~~ (i) Autolysate

~~*~~ (ii) Bakers

~~*~~ (iii) Brewers

~~*~~ (iv) Nutritional

~~*~~ (v) Smoked - nonsynthetic smoke flavoring process must be documented.

NOP: Final Rule**Subpart G - Administrative****(b) Synthetics allowed:**

- * (1) Alginates
- (2) Ammonium bicarbonate - for use only as a leavening agent
- (3) Ammonium carbonate - for use only as a leavening agent
- * (4) Ascorbic acid
- (5) Calcium citrate
- (6) Calcium hydroxide
- (7) Calcium phosphates (monobasic, dibasic, and tribasic)
- (8) Carbon dioxide
- (9) Chlorine materials - disinfecting and sanitizing food contact surfaces, *Except*. That, residual chlorine levels in the water shall not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act.
 - (i) Calcium hypochlorite
 - (ii) Chlorine dioxide
 - (iii) Sodium hypochlorite
- (10) Ethylene - allowed for postharvest ripening of tropical fruit
- (11) Ferrous sulfate - for iron enrichment or fortification of foods when required by regulation or recommended (independent organization)
- (12) Glycerides (mono and di) - for use only in drum drying of food
- (13) Glycerin - produced by hydrolysis of fats and oils
- (14) Hydrogen peroxide
- (15) Lecithin - bleached
- (16) Magnesium carbonate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic"
- (17) Magnesium chloride - derived from sea water
- (18) Magnesium stearate - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic"
- * (19) Nutrient vitamins and minerals, in accordance with 21 CFR 104.20, Nutritional Quality Guidelines For Foods
- * (20) Ozone
- (21) Pectin (low-methoxy)
- (22) Phosphoric acid - cleaning of food-contact surfaces and equipment only
- (23) Potassium acid tartrate
- (24) Potassium tartrate made from tartaric acid
- (25) Potassium carbonate
- (26) Potassium citrate
- (27) Potassium hydroxide - prohibited for use in lye peeling of fruits and vegetables
- (28) Potassium iodide - for use only in agricultural products labeled "made with organic (specified ingredients or food group(s))," prohibited in agricultural products labeled "organic"
- * (29) Potassium phosphate - for use only in agricultural products labeled "made with organic (specific ingredients or food group(s))," prohibited in agricultural products labeled "organic"
- * (30) Silicon dioxide

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- * (31) Sodium citrate
- (32) Sodium hydroxide - prohibited for use in lye peeling of fruits and vegetables
- * (33) Sodium phosphates - for use only in dairy foods
- (34) Sulfur dioxide - for use only in wine labeled "made with organic grapes," *Provided*, That, total sulfite concentration does not exceed 100 ppm.
- * (35) Tocopherols - derived from vegetable oil when rosemary extracts are not a suitable alternative
- * (36) Xanthan gum

(c)-(z) [Reserved]

§ 205.606 Nonorganically produced agricultural products allowed as ingredients in or on processed products labeled as organic or made with organic ingredients.

The following nonorganically produced agricultural products may be used as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))" only in accordance with any restrictions specified in this section.

Any nonorganically produced agricultural product may be used in accordance with the restrictions specified in this section and when the product is not commercially available in organic form.

- * (a) Cornstarch (native)
- * (b) Gums - water extracted only (arabic, guar, locust bean, carob bean)
- * (c) Kelp - for use only as a thickener and dietary supplement
- * (d) Lecithin - unbleached
- * (e) Pectin (high-methoxy)

§ 205.607 Amending the National List.

(a) Any person may petition the National Organic Standard Board for the purpose of having a substance evaluated by the Board for recommendation to the Secretary for inclusion on or deletion from the National List in accordance with the Act.

(b) A person petitioning for amendment of the National List should request a copy of the petition procedures from the USDA at the address in § 205.607(c).

(c) A petition to amend the National List must be submitted to: Program Manager,
USDA/AMS/TMP/NOP, Room 2945, South Building, P.O. Box 96456, Washington, DC 20090-6456.

§§ 205.608 - 205.619 [Reserved]